

EXHIBIT B

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

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**KATHY PEREZ-WHITE and BARBARA
RODRIGUEZ, individually and on
behalf of others,**

Plaintiffs,

-against-

**ADVANCED DERMATOLOGY OF NEW YORK P.C.,
LAWRENCE JAEGER, and NICOLE MAULELLA,**

Defendants.
-----X

Case No. 15-cv-4858 (PGG)

**OFFER OF JUDGMENT PURSUANT
TO F.R.C.P. 68**

TO KATHY PEREZ-WHITE, BARBARA RODRIGUEZ, and MARTHA SANTOS:

Pursuant to Rule 68 of the Federal Rules of Civil Procedure, Defendants, Advanced Dermatology of New York, P.C., Lawrence Jaeger, and Nicole Maulella, offer to allow judgment to be taken against them in this action with respect to:

1. The first (overtime under FLSA), second (overtime under NYLL), fourth (breach of contract), and fifth (NYLL straight time) causes of action contained in the Complaint asserted by KATHY PEREZ-WHITE and BARBARA RODRIGUEZ; and
2. Potential Claims under the FLSA and NYLL for unpaid wages for potential opt-in MARTHA SANTOS.

The terms of the judgment to which Defendants consent are:

Judgment for KATHY PEREZ-WHITE in the amount of \$16,780.39 as well as costs and reasonable attorneys' fees incurred by KATHY PEREZ-WHITE to the date of this offer.

Judgment for BARBARA RODRIGUEZ in the amount of \$6,404.95 as well as pre-judgment interest (interest only for the second and fifth causes of action), costs and reasonable attorneys' fees incurred by BARBARA RODRIGUEZ to the date of this offer.

Judgment for MARTHA SANTOS in the amount of \$1,632.53

as well as costs and reasonable attorneys' fees incurred by MARTHA SANTOS to the date of this offer.

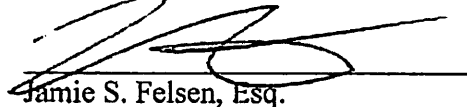
To be valid, the Offer of Judgment must be accepted by KATHY PEREZ-WHITE, BARBARA RODRIGUEZ, and MARTHA SANTOS.

This offer of judgment is made solely for the purposes specified in Rule 68 of the Federal Rules of Civil Procedure, and is not to be construed either as an admission that Defendants are liable in this action, or that KATHY PEREZ-WHITE, BARBARA RODRIGUEZ, and MARTHA SANTOS have suffered any damages.

KATHY PEREZ-WHITE, BARBARA RODRIGUEZ, and MARTHA SANTOS have fourteen (14) days from the date on which this offer was served in which to accept in writing. If KATHY PEREZ-WHITE, BARBARA RODRIGUEZ, and MARTHA SANTOS accept this offer, the offer will be filed with the court, and the clerk of the court will enter a final judgment in this action that conforms to the terms set out in this offer. If KATHY PEREZ-WHITE, BARBARA RODRIGUEZ, and MARTHA SANTOS fail to accept the offer within the time allowed, it is deemed withdrawn. If KATHY PEREZ-WHITE, BARBARA RODRIGUEZ, and MARTHA SANTOS fail to recover a more favorable judgment than the one specified in this offer of judgment, KATHY PEREZ-WHITE, BARBARA RODRIGUEZ, and MARTHA SANTOS may be liable for all the costs of suit incurred by Defendants after the date of this offer.

Dated: Lake Success, New York
September 2, 2015

MILMAN LABUDA LAW GROUP PLLC



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